

REMARKS/ARGUMENTS

Claims 1-35 are pending in this application. Claims 1-35 stand rejected.

Claims 1, 5, 11-13, 19-20, 22-23, 26, and 28 have been amended for further prosecution. Support for the amendment may be found, for example, the description on page 9, paragraph [0045] of the present specification and FIGS. 5A and 5B. The amendment also includes minor changes of a clerical nature. No new matter has been introduced by this amendment.

The specification has been amended to correct a minor error. No new matter has been introduced by this amendment.

Rejection of Claims under 35 U.S.C. § 103:

Claims 1-35 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Suda* (U.S. 2004/0123059) in view of *Kim et al.* (U.S. 2004/0019736). Applicants respectfully disagree for the reasons set forth below.

A. Claim 1 defines a method for reading data from a memory card providing non-volatile data storage. The claimed method includes, among others, (a) accessing volume information stored in a portion of a first volume of the address space of the non-volatile data storage, (b) determining whether the non-volatile data storage has a single volume address space or a multiple volume address space based on the volume information, and (c) operating the memory card by accessing the entire address space of the non-volatile data storage as the single volume when said determining (b) determines that the single volume address space is present on the memory card, as recited in claim 1 as amended.

The Examiner specifically interprets that *Suda*'s "storage area" includes both first storage area 11a and first internal register 12a within memory card 3 (FIGS. 1 and 4a-4b thereof), teaching the claimed first volume, and thus alleges that *Suda*'s value indicating the number of the storage areas teaches the claimed volume information. However, the Examiner's interpretation is incorrect for the following reasons.

First, an "internal" register of *Suda* is internal to the memory card 3, not internal to the alleged "storage area." The storage areas 11 (11a, 11b, ...) and the corresponding internal

registers 12 (12a, 12b, ...) of Suda are illustrated as separate, distinct, and independent blocks in all of Suda's embodiments. Furthermore, as shown in FIG. 3 of Suda, the internal register 12 (18) can be provided for a plurality of storage areas 11a through 11d, and retains a flag indicating "the area which the controller 10 currently judges as the storage area" and "the quantity of the storage areas possessed by the memory card 3" (see page 3, paragraph [0043] of Suda). Thus, the information (flag) in Suda's internal register 12 (18) is dynamic and must be changed depending on which storage area is currently used. In order to access the correct storage area in use, Suda's system must access the internal register 12 prior to accessing any of the storage areas. Thus, Suda's flag (alleged volume information) cannot be stored within in one of the storage areas 11 which may or may not be accessed.

Furthermore, as shown in FIG. 5 of Suda, "the first storage area 11a occupies a hexadecimal address from 00000 to 0FFFFF. The second storage area 11b occupies an address from 0FFFFF to 1FFFFF" (page 4, paragraph [0055]). Thus, apparently Suda's internal registers 12 are not included in the address space 00000 through xFFFF of the storage area 11.

On the other hand, in the present invention, as shown in FIGS. 5A and 5B, for example, the volume information is provided within the address space of non-volatile data storage, as a portion of a first volume. Claim 1 has been amended to clarify this distinctive feature.

Accordingly, Suda fails to teach or suggest (a) accessing volume information stored in a portion of a first volume of the address space of the non-volatile data storage, as recited in claim 1. Claims 13 and 19 also include substantially the same distinctive feature as claim 1. The secondary reference Kim also fails to teach or suggest the claimed volume information as discussed above.

Accordingly it is respectfully requested that the rejection of claims 1, 13, and 19 based on Suda and Kim be withdrawn.

It should be noted that neither Suda nor Kim, alone or in combination, does not teach or suggest (c) operating the memory card by accessing the entire address space of the non-volatile data storage as the single volume when said determining (b) determines that the single volume address space is present on the memory card, as recited in claim 1 as amended. The reasons are discussed in detail in Section B below.

B. Claim 26 defines a method for reading data from a memory card. The claimed method includes, among others, (a) accessing a switch position of a switch on the memory card; (b) determining whether the non-volatile data storage has a single volume address space or a multiple volume address space based on the switch position; and (c) operating the memory card by accessing the entire address space as a single volume when said determining (b) determines that the single volume address space is present on the memory card, as recited in claim 26 as amended.

Suda describes a memory card that have a plurality of storage areas 11 and an area switching module 22 which switches between the plurality of storage areas 11 so that the memory card can utilize a storage capacity larger than the marginal capacity of the file system. However, given the plurality of storage areas 11, memory card in Suda merely selects one of the storage areas to be utilized at a given point in time (see page 1, paragraph [0013] of Suda). There is no occasion in Suda that a plurality of storage areas (i.e., divisions of the address space) are handled as a single large area (single volume address space), contrary to the claimed invention as recited in claim 26. In addition, although storage areas of different capacities are given in Suda, one of the storage area is handled by file system A, and the other is handled by different file system B (see page 5, paragraph [0063] of Suda). The two storage of Suda are never handled together as a larger, single storage area. Thus, Suda fails to teach or suggest accessing the entire storage area as a single volume address space, as recited in claim 26.

Claim 28, as well as claims 1, 13, and 19, also includes substantially the same distinctive features as claim 26. The secondary reference Kim also fails to teach or suggest the claimed volume information as discussed above.

Accordingly it is respectfully requested that the rejection of claims 26 and 28 based on Suda and Kim be withdrawn. It should be noted these features provide additional reasons for patentability as to claims 1, 13, and 19 discussed above.

Dependent Claims

Claims 2-12 depend from claim 1, claims 14-18 depend from claim 13, claims 20-25 depend from claim 19, claim 27 depends from claim 26, and claims 29-34 depend from claim 28, and thus are also patentably distinct from the cited references for at least the same reasons as


those recited above for the respective independent claims, upon which they ultimately depend. These dependent claims recite additional limitations that further distinguish these dependent claims from the cited references. For at least these reasons, the dependent claims are not made obvious by the prior cited in the Office Action.

CONCLUSION

Applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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